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IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NEW YORK

	X
APPLE INC.,	:
Plaintiff,	: :
-against-	Civil Action No.
APPLE STORY INC., FUN ZONE INC.,	FILED UNDER SEAL
JANICE PO CHIANG, JOHN DOES 1-50, and XYZ BUSINESSES,	; ;
Defendants.	: x

EX PARTE MOTIONS FOR SEIZURE ORDER, TEMPORARY RESTRAINING ORDER, EXPEDITED DISCOVERY AND ORDER TO SHOW CAUSE FOR PRELIMINARY INJUNCTION

Plaintiff Apple Inc. ("Apple") hereby applies ex parte for issuance of a temporary restraining order, seizure order, expedited discovery and to show cause for a preliminary injunction. Defendants are distributing and selling counterfeit Apple accessories for three of Apple's most enormously successful products, namely Apple's IPOD line of portable digital music and media devices, the IPHONE mobile communication and media device and the IPAD multi-purpose mobile device. Further, defendants are selling their counterfeit accessories for these products in a store defendants have branded "APPLE STORY." Apple hereby requests, among other things, entry of a temporary restraining order without notice as well as an order allowing Apple to seize the counterfeit goods, and books and records related thereto under the

Trademark Counterfeiting Act and an order to show cause for a preliminary injunction to stop the

counterfeiting and defendants' use of the infringing and diluting Apple Story name pending the

resolution of this case.

As set forth in Apple's Memorandum of Law, the relief requested herein is authorized by

law. This application is further supported by the annexed declarations and exhibits.

Dated: July 25, 2011

Todd R. Hambidge

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